UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

A. SCHULMAN, INC.,)
Plaintiff and Counter-Defendant,) Case No. 1:15 CV 1760
v.) Judge Patricia A. Gaughar
POLYONE CORPORATION and POLYONE DESIGNED STRUCTURES AND SOLUTIONS LLC)) DECLARATION OF) DR. CYNTHIA GOSSELIN
Defendants and Counter-Plaintiffs.)
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- I, Dr. Cynthia Gosselin, declare under penalty of perjury:
- I am a resident of Florida and am over 18 years of age. I have no legal disabilities that would prevent me from testifying to the matters set forth in this Declaration.
- 2. I am the President of Coatings Unlimited Consulting, LLC, a company that provides materials engineering and failure analysis consulting services to the coil coating, steel, aluminum, metallic and nonmetallic coating and affiliate customer industries. I am also a Senior Consultant for The ChemQuest Group Inc., a company that provides strategic management consulting services within in the specialty chemicals market with specific emphasis on business strategy, technology and development mergers, technical road maps, decision and risk analysis, application process technology and independent evaluations.
- 3. I have been retained by Defendant, PolyOne Corporation and PolyOne Designed Structures and Solutions LLC ("PolyOne"), to aid in the understanding of several features described in U.S. Patent Nos. 8,007,902 and 8,182,906 ("the asserted patents") and the meaning of certain claim terms in the asserted patents. My opinions are set forth in the L.P.R. 4.3(a)

Declaration of Dr. Cynthia Gosselin in Support of PolyOne's Proposed Claim Construction, signed September 30, 2016. Attached as **Exhibit A** is a true and correct copy of my L.P.R. 4.3(a) Declaration.

- 4. I have also been retained by PolyOne to provide a declaration in the nature of a rebuttal to the declaration of Plaintiff's Expert, Jamil Baghdachi, PhD, dated September 30, 2016 (the "Baghdachi Report"). My rebuttal is set forth in the L.P.R. 4.3(b) Rebuttal Declaration of Dr. Cynthia Gosselin in Support of PolyOne's Proposed Claim Construction, signed October 18, 2016. Attached as **Exhibit B** is a true and correct copy of my L.P.R. 4.3(b) Rebuttal Declaration.
- 5. My credentials, including my educational background, professional experience, professional credentials, and accomplishments are set forth in my Curriculum Vitae, which is enclosed with my L.P.R. 4.3(a) Declaration as Exhibit 1. In addition to the information in by C.V., my background qualifications are further set forth in my L.P.R. 4.3(a) Declaration at pages 1-2.
- My opinions and the basis for my opinions are set forth in detail in my L.P.R.
 4.3(a) Declaration and my L.P.R. 4.3(b) Rebuttal Declaration, and are adopted and incorporated herein.
- 7. My L.P.R. 4.3(a) Declaration and L.P.R. 4.3(b) Rebuttal Declaration set forth facts on which my opinions are based, including facts about polymer materials sciences and testing organic and organic/metallic systems. The facts contained in my L.P.R. 4.3(a) Declaration and L.P.R. 4.3(b) Rebuttal Declaration are true, based on my personal knowledge, and I am competent to testify to them.

I declare under penalty of perjury under the laws of the United States of America that the

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Cynthia Co. Gasselin Cynthia Gosselin